

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
W. R. GRACE & CO., <u>et al.</u> , <sup>1</sup>	)	Case No. 01-01139 (JKF)
	)	
Debtors.	)	Jointly Administered

Hearing Date: August 25, 2003 at 12:00 pm  
Regarding Docket Nos. 4084 & 4188

**MOTION FOR LEAVE TO FILE DEBTORS' REPLY TO THE OBJECTION OF  
THE OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS  
TO THE DEBTORS' FIFTH MOTION FOR AN ORDER PURSUANT TO  
11 U.S.C. §1121(d) EXTENDING DEBTORS' EXCLUSIVE PERIODS IN WHICH  
TO FILE A CHAPTER 11 PLAN AND TO SOLICIT VOTES THEREON**

The debtors and debtors in possession (the "Debtors") in the above-captioned cases hereby request authority pursuant to Del.Bankr.LR 9006-1(d) to file a reply (the "Reply") to the *Objection* (the "Objection") of the *Official Committee of Asbestos Personal Injury Claimants to the Debtors' Fifth Motion* (the "Motion") for an Order Pursuant to 11 U.S.C. § 1121(d) extending Debtors' Exclusive Periods in Which to File a Chapter 11 Plan and to Solicit Votes Thereon. The hearing on the Motion is currently scheduled for August 25, 2003, at 12:00 p.m.

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc.), E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

The Debtors seek leave to file a Reply for the purpose of addressing the matters raised by the Objection. The Debtors respectfully submit that the Reply will assist the Court in making its determination with respect to the relief requested in the Motion.

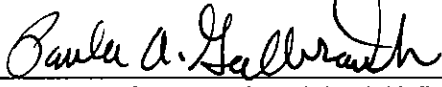
WHEREFORE, the Debtors respectfully request the entry of an Order granting the Debtors authority to file the Reply, a copy of which is attached hereto as **Exhibit "A."**

Dated: August 15, 2003

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Co-Counsel for the Debtors and Debtors in Possession

SO ORDERED this \_\_\_\_ day  
of \_\_\_\_\_, 2003

\_\_\_\_\_  
The Honorable Judith K. Fitzgerald  
United States Bankruptcy Judge